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Carol Hanlon  
S&ER Products Manager  
U. S. Department of Energy  
Yucca Mountain Site Characterization Office  
P.O. Box 30307 M/S 025  
North Las Vegas, NV 89036-0707

Dear Ms. Hanlon,

This letter is written to express comments about a document that I understand you are producing, a Preliminary Site Suitability Evaluation, for the Yucca Mountain site as the national repository for high level waste.

Since I have not reviewed the document itself, I cannot comment on it or whether or not Yucca Mountain is a suitable site for a repository of this type. I know that DOE has engaged all of the necessary technical expertise available to determine, as best the state of the art permits, whether or not the site is suitable for it's intended use. My understanding is that it is suitable. I would like to express some opinions regarding the spent fuel issues.

First, the need for this project grew out of a bad decision made by the Carter Administration about 1977 regarding recycling of reactor fuels. When this occurred, utilities were left without a waste disposal outlet for spent fuel, so the utilities (as well as the government) have adopted a "reactor fuel is the final waste form" mentality. Well, spent fuel has been piling up at reactors for 25 years, and the inventory at many of them has approached the point of becoming a problem. The US Congress in 1982 established a fund to pay for the fixing the problem, the Yucca Mountain site was proposed and has been studied intensely since then (probably to the point that those doing the studies are sick of doing them). The fund meanwhile has supposedly accumulated some \$16 billion. DOE was supposed to begin taking fuel in 1998, but since the repository "wasn't ready" then, DOE is not in compliance with the law.

Utilities have the right to expect that the funds taxed from them (probably without their consent) to provide a spent fuel repository are in fact being spent for that purpose, and that an actual repository is constructed so they can actually ship their spent fuel to it. I think 25 years is an adequate study period.

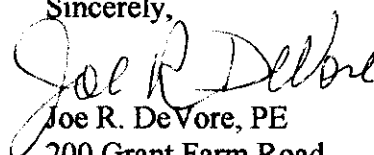
I further think that the rigor given to the testing and approval of spent fuel shipping casks renders safety arguments regarding the shipping of reactor fuels moot.

As you well know, reactor fuel consists of mostly uranium, depleted in its low-enriched U-235 content. The real waste is the cladding and fission products contained in the fuel,

which is a relatively small percentage of the total mass. As far as energy content, the amount of reactor fuel to be disposed of at Yucca Mountain represents a tremendous energy resource. Therefore the fuel is not a waste form, but a potential energy source. If this fuel is not stored retrievably so that the uranium could be recovered whenever the nation comes to its senses, then it will be lost as a resource if there ever is a need for it.

Now that we have an administration that says that it is at least interested in pursuing nuclear power as an energy source, there is the potential in the out years for an even greater production of spent fuel. Even if this doesn't come to pass this problem will only get worse as the inventory of spent fuel grows from existing plants. I think the time for study is long past, that all of the excuses have been settled, and that DOE needs to get on with building this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe R. DeVore".

Joe R. DeVore, PE  
200 Grant Farm Road  
Kingston, TN 37763